

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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GEORGINA MORGENSTERN,

Plaintiff,

-against-

04-CV-0058
(JS)(ARL)

COUNTY OF NASSAU; NASSAU LOCAL 830,
CIVIL SERVICE EMPLOYEES ASSOCIATION,
INC.; THOMAS R. SUOZZI, ANTHONY M.
CANCELLIERI, PATRICIA BOURNE and
JOHN P. DONNELLY, in their individual
and official capacities,

**NOTICE OF MOTION FOR
JUDGMENT ON THE
PLEADINGS PURSUANT
TO RULE 12(C) OF THE
FED. RULES OF CIV. PROC.**

Defendants.

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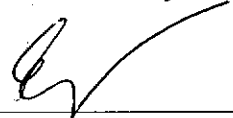
PLEASE TAKE NOTICE that upon the accompanying declaration of Esther D. Miller, Esq. dated March 30, 2005, the exhibit attached thereto, and upon the accompanying Memorandum of Law in Support of the Motion for Judgment on the Pleadings, together with all prior pleadings and proceedings had herein, defendants Nassau County, Thomas R. Suozzi, Anthony M. Cancellieri, Patricia Bourne and John P. Donnelly, will move this Court before the Honorable Joanna Seybert, on a date to be determined by the Court, at the Courthouse of the United States District Court, Eastern District of New York, located at 100 Federal Plaza, Central Islip, New York 11722, for an Order dismissing entirely the Fourth, Fifth and Sixth Causes of Action of the Amended Complaint, and dismissing the First Cause of Action of this Amended Complaint as to defendant Donnelly, pursuant to Rule 12(c) of the Federal Rules of Civil

Procedure and applicable Local Rules and for such other and further relief as may be just,
proper and equitable.

Dated: Mineola, New York
April 1, 2005

LORNA B. GOODMAN
Nassau County Attorney

By:



Esther D. Miller (EM 2416)

Deputy County Attorney
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Attorneys for Defendants
County of Nassau, Thomas R.
Suoizzi, Anthony M. Cancellieri;
Patricia Bourne and John Donnelly.

Of Counsel:

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Bernadette K. Ford (BKF 4339)
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And Nassau Local 830